

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GLOBAL GAMING PHILIPPINES, LLC,

Plaintiff,

vs.

21 Cv. 2655 (LGS)

ENRIQUE K. RAZON, JR.;
BLOOMBERRY RESORTS AND HOTELS
INC.; SURESTE PROPERTIES, INC.;
COLLINGWOOD OIL & GAS HOLDINGS,
LLC; COLLINGWOOD USA, INC.;
COLLINGWOOD BROOKSHIRE USA,
INC.; COLLINGWOOD APPALACHIAN
MINERALS, LLC; ASIA ARROW
LIMITED; RIZOLINA LLC; ENSARA LLC;
NOZAR LLC; BOWERY BAY LLC;
CAMPANILLA LLC; FESARA LLC; AND
11 ESSEX STREET REALTY LLC,

Defendants.

**NOTICE OF PLAINTIFF'S MOTION FOR ORDER RESTRAINING DEFENDANTS
FROM REMOVAL, TRANSFER OR OTHER DISSIPATION OF MOBILE ASSET
PENDING TURNOVER**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law dated March 31, 2021, the accompanying Declarations of Jason P.W. Halperin and Daniel H. Weiner and the exhibits attached thereto, and the [Proposed] Order, Plaintiff Global Gaming Philippines, LLC will move this Court, before the Honorable Lorna G. Schofield, United States District Judge, located at the Thurgood Marshall United States Courthouse, 40 Foley Square, at a date and time to be determined by the Court, for an Order pursuant to Rule 64 of the Federal Rules of Civil Procedure, as well as New York Civil Practice Laws and Rules § 5229.

Dated: March 31, 2021
New York, New York

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo,
P.C

Respectfully submitted,

By: /s/ Jason P.W. Halperin

Robert I. Bodian
Jason P.W. Halperin
Daniel T. Pascucci
(Pro Hac Vice application pending)
Joseph R. Dunn
(Pro Hac Vice application pending)
Danielle P. Richards
(Pro Hac Vice application forthcoming)
Michael J. Godwin
(Pro Hac Vice application forthcoming)

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